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10 *Attorney for LOANCARE, LLC fka LOANCARE*  
11 *SERVICING CENTER, INC.*

12 **UNITED STATES DISTRICT COURT**  
13 **DISTRICT OF NEVADA**

14 MICHAEL J. STACK,

15 Plaintiff,

16 v.

17 EQUIFAX INFORMATION SERVICES,  
18 LLC, FLAGSTAR BANK; LOANCARE  
19 SERVICING CENTER; PHH  
20 MORTGAGE SERVICE,

21 Defendants.

Case No. 2:19-cv-01720-GMN-VCF

22 **STIPULATION AND ORDER TO**  
23 **EXTEND TIME TO FILE**  
24 **RESPONSIVE PLEADING TO**  
25 **COMPLAINT**

26 **[FIRST REQUEST]**

27 Plaintiff Michael J. Stack ("Plaintiff"), by and through his counsel, and  
28 Defendant LoanCare, LLC, fka LoanCare Servicing Center, Inc. ("LoanCare")  
(collectively the "Parties"), by and through its counsel, agree and stipulate as  
follows:

IT IS HEREBY STIPULATED that LoanCare shall have up to and including

1 **December 9, 2019** within which to file its response to Plaintiff's Complaint:

2 1. LoanCare was served on October 9, 2019.

3  
4 2. LoanCare's responsive pleading would otherwise be due October 30,  
5 2019.

6 3. The Parties are investigating the allegations and are engaged in early  
7 settlement discussions.

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9 4. The Parties expect to determine in the near future whether this action  
10 can be resolved at this early stage.

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12 5. This is the first stipulation for an extension of time to respond to the  
13 Complaint, and this request is not being made for purposes of delay or any other  
14 improper reason, but rather for the Parties to investigate the merits of the claim and  
15 explore the potential for early settlement resolution, and to allow LoanCare to  
16 formulate its responsive pleading.

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18 STIPULATED and AGREED to this 28<sup>th</sup> day of October 2019.  
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/s/ Anna Jane I. Zarndt

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/s/ Shawn Miller

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*Attorney for Plaintiff MICHAEL J.  
STACK*

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IT IS HEREBY ORDERED that Defendant LoanCare, LLC fka LoanCare Servicing Center, Inc. shall have up to and including December 9, 2019 within which to file its response to Plaintiff's Complaint.

**IT IS SO ORDERED.**

Gloria M. Navarro, District Judge  
United States District Court

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**CERTIFICATE OF SERVICE**

I hereby certify that on October 28, 2019, I served a true and correct copy of this **STIPULATION AND ORDER TO EXTEND TIME TO FILE RESPONSIVE PLEADING TO COMPLAINT** upon all counsel of record by using the United States District Court, District of Nevada's Case Management/Electronic Case Filing System that will electronically mail notification to all parties appearing in this case.

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